



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV  
345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

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1/2/90

Mr. Ellis Saad  
5831 Pettus Road  
Nashville, TN 37013

Dear Mr. Saad:

I appreciate your correspondence of December 29, 1989, and your expressed willingness to perform the cleanup required at the Saad Site. I would like to reiterate, however, what I told you in our telephone conversation of December 26, that you should not perform any work at the site until it has been approved by EPA. Failure to obtain this approval could result in penalties against you if not done properly.

With regards to the letter itself, unfortunately, it is not adequate. You need to submit a work plan detailing the following items:

- Dates of proposed work, with a firm completion date;
- Complete detailed scope of the activities that you propose to accomplish at the site;
- Details on who will be performing the work, contractors names, etc., and what each will be doing;
- Details on how and where you plan on sending the materials for disposal;
- Details on interim steps you plan to take to contain the exposed liquids and sludges to prevent possible migration (i.e., pump into good tanks); and,
- Dates for the interim steps.

In addition, I would like to point out that I think your cost estimates are extremely low. Please tell me whatever you can on how you arrived at these numbers. Also, please send me the copies of your analytical on the tank contents whenever you receive them.

If I do not get a satisfactory response to this letter, and the other PRP's do not submit a draft consent order to EPA, by January 5, 1990, EPA will begin to take steps to perform the work, and will then seek to recover the costs at a later date.

Thank you for your cooperation.

Sincerely,

Kelly S. McCarty  
EPA Region IV OSC